

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: SLABBED NEW MEDIA, LLC
Debtor

CHAPTER 11
CASE NO. 15-50963-KMS

MOTION TO EXTEND EXCLUSIVITY

COMES NOW Slabbed New Media, LLC (the “Debtor”), and files this its *Motion to Extend Exclusivity* (the “Motion”), and in support thereof, would show unto the Court the following, to-wit:

1. The Disclosure Statement and Plan of Reorganization are currently due on December 14, 2015.
2. Subsequent to the entry of the scheduling order establishing December 14, 2015, as the deadline for the filing of the Disclosure Statement and Plan of Reorganization, additional claims have arisen directly and indirectly against the Debtor and its principal, Douglas Handshoe.
3. Debtor is obligated to indemnify Mr. Handshoe for claims filed against him arising out of his functioning as an employee and manager of the Debtor.
4. It is Debtor’s present intent to intervene in certain claims brought, on an indirect basis, that have been filed both against and by Mr. Handshoe.
5. However, Debtor has not yet engaged Louisiana counsel to assist in those endeavors, nor has it removed certain claims or causes of action to this Court that it intends to remove. The filing of a Disclosure Statement and Plan at this stage would be premature and a waste of estate assets, costs and expenses.
6. Debtor estimates that it will be approximately sixty (60) days before the interventions and removals have been filed and requests sixty (60) days within which to file its Disclosure Statement and Plan.
7. Other grounds to be assigned upon a hearing hereof.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully requests that the Court will grant the Motion and extend the deadline for filing the Disclosure Statement and Plan of Reorganization for sixty (60) days. Debtor prays for general relief.

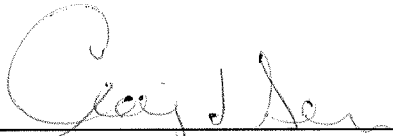
This, the 1st day of November, 2015.

Respectfully submitted,

SLABBED NEW MEDIA, LLC

By Its Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: 
Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793
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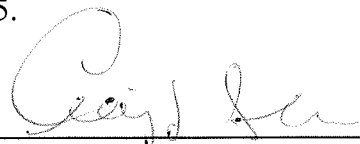
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CERTIFICATE OF SERVICE

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via Notice of Electronic Filing, a true and correct copy of the above and foregoing instrument to:

Christopher J. Steiskal, Esq.
Office of the United States Trustee
christopher.steiskel@usdoj.gov

This, the 14th day of December, 2015.


Craig M. Geno